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Attorneys for Loumar Inc. and Franklin Lakes Affordable Reality
Our File No. 94877 ELH

MARK FULTZ AND ADVOCATES
FOR DISABLED AMERICANS
(AFDA)

Plaintiff

V.

1122 ROUTE 22 MOUNTAIN SIDE
LLC, LOUMAR INC. AND
FRANKLIN LAKES AFFORDABLE
REALITY

Defendant

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY
CIVIL ACTION NO.:

Civil Action

**NOTICE OF REMOVAL TO UNITED STATES
DISTRICT COURT**

PLEASE TAKE NOTICE that Defendants hereby file this Notice of Removal of the above-captioned matter to the United States District Court for the District of New Jersey from the Gloucester County Superior Court, Law Division, where the action is now pending, pursuant to 28 U.S.C. § 1446 and state:

1. The action is a civil action filed in the Gloucester County Superior Court, Law Division under Docket Number GLO-L-0329-24 and is pending therein.

2. Because of the following facts, defendants request that this action proceed in this Court as an action properly removed to it:

A. In the Complaint, (attached hereto at **Ex. A**) at Count One, Plaintiffs allege violations of the Americans with Disabilities Act, 42 U.S.C. Sec. 12101 et seq.

B. This Court has original jurisdiction under the provisions of 28 U.S.C. § 1331, because Plaintiffs' claims raise issues under federal law.

C. Accordingly, this action may be removed by Defendants under 28 U.S.C. § 1441.

4. Thirty days have not elapsed since the service of process of the Complaint upon the Defendants in state court.

5. Copies of all process, pleadings, and orders served upon defendants are attached to this Notice of Removal, in accordance with 28 U.S.C. § 1446.

6. Concurrent with the filing of this Notice of Removal, Defendants are providing written notice to all parties and the Clerk of the Superior Court of New Jersey, Law Division, County of Gloucester, pursuant to 28 U.S.C. § 1446.

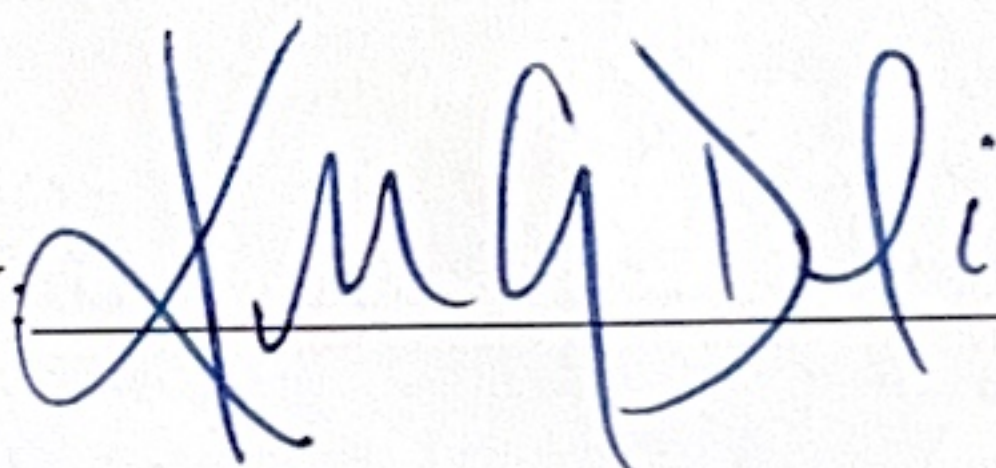
WHEREFORE, Defendants request that this action proceed in this Court as an action properly removed to it.

METHFESSEL & WERBEL, ESQS.
Attorneys for Loumar Inc. and
Franklin Lakes Affordable Reality

By 

Eric L. Harrison

Attorneys for 1122 ROUTE 22
MOUNTAINSIDE LLC

BY: 
KEVIN Q. DESAI

DATED: April 12, 2024